

EXHIBIT A

From: Slack, Richard
Sent: Monday, June 26, 2023 6:08 PM
To: DiCicco, Susan F.
Cc: dgrassgreen@pszjlaw.com; Irwin Schwartz; Nolan, Jack; Michael.Reiss@lw.com; Jeffrey Ritholtz; Doolittle, Jonathan; Richard Bodnar; Murphy, Julie; Michael Hampson; Frank Catalina; metkin@lowenstein.com; abehlmann@lowenstein.com; randy.michelson@michelsonlawgroup.com; Michael Palmieri; James Brandt (james.brandt@lw.com); Karotkin, Stephen; Liou, Jessica; Gordan, Anna
Subject: RE: PG&E -- Proposed Order with Objectors' comments

Below are proposed procedures relating to the amendment and objection process. After you have had a chance to review, we suggest setting up a meet and confer later this week to discuss. Let us know some times that work.

Proposed Procedures:

1. The claimants who objected to the extension of the securities objection deadline (the "Objectors") will agree upon a single, coordinated date upon which they each will file, or notify the Reorganized Debtors that they do not intend to file, a supplement to or amendment of their proof of claim. The Reorganized Debtors reserve all their rights with respect to any amendments, including preserving any objection to the addition of new, untimely claims.
2. The date for the Reorganized Debtors to object to securities claims (subject to extension under Section F of the Offer Procedures and Section C of the Securities Mediation Procedures under the Securities Procedures, as applicable) shall be 75 days from the date selected by the Objectors in item 1. This will be the Securities Objection Deadline.
3. The date for the Reorganized Debtors to object to the proofs of claim of the Objectors will be the Securities Objection Deadline, unless otherwise agreed to by an Objector pursuant to item 5 below or ordered by the Court, and will not be extended by the provisions under Section F of the Offer Procedures and Section C of the Securities Mediation Procedures under the Securities Procedures.
4. Two weeks after the Securities Objection Deadline, or on the date next convenient to the Court, the Court will hold a conference on procedures and schedules with respect to the Reorganized Debtors' objections to the claims of the Objectors, including providing a schedule for the filing and adjudication of any motions to intervene. The Reorganized Debtors will draft, in consultation with the Objectors, typical procedures for the Court to approve, which procedures shall establish a "sufficiency hearing" process to test whether a Claim has failed to state a claim against the Debtors which can be allowed and should be dismissed pursuant to Bankruptcy Rule 7012(b). The legal standard of review that will be applied by the Court at a Sufficiency Hearing will be equivalent to the standard applied by the Court upon a motion to dismiss for failure to state a claim upon which relief can be granted, in accordance with Bankruptcy Rule 7012(b). Discovery with respect to a Claim will not be permitted until after a sufficiency hearing has been conducted and the Court has found the claim to be sufficient to proceed and thereafter the parties would seek a conference with the Court to set a schedule with respect to that Claim.

5. Any Objector may stipulate with the Reorganized Debtors to a different schedule, including a later objection deadline than set forth in item 3 with respect to its proofs of claim (whether for purposes of allowing for negotiations and mediation on settlement or otherwise) without having to file an amended proof of claim pursuant to the above schedule.

From: Slack, Richard

Sent: Monday, June 26, 2023 3:41 PM

To: 'DiCicco, Susan F.' <susan.dicicco@morganlewis.com>; Gordan, Anna <Anna.Gordan@weil.com>

Cc: dgrassgreen@pszjlaw.com; Irwin Schwartz <ischwartz@blaschwartz.com>; Nolan, Jack <Jack.Nolan@weil.com>; Cummings, Kyle <Kyle.Cummings@weil.com>; Michael.Reiss@lw.com; Jeffrey Ritholtz <JRitholtz@rksllp.com>; Doolittle, Jonathan <jonathan.doolittle@pillsburylaw.com>; Richard Bodnar <rbodnar@rksllp.com>; Murphy, Julie <Jmmurphy@stradley.com>; Michael Hampson <mhampson@rksllp.com>; Frank Catalina <fcatalina@rksllp.com>; metkin@lowenstein.com; abehlmann@lowenstein.com; randy.michelson@michelsonlawgroup.com; Michael Palmieri <mpalmieri@fklaw.com>

Subject: RE: PG&E -- Proposed Order with Objectors' comments

I expect we will be sending out a proposed protocol later today and we should set then set up a time to talk over the next couple of days.

Given that the Court's order pushed the conference, it makes more sense to talk after you have had a chance to review it.

From: DiCicco, Susan F. <susan.dicicco@morganlewis.com>

Sent: Monday, June 26, 2023 3:35 PM

To: Slack, Richard <richard.slack@weil.com>; Gordan, Anna <Anna.Gordan@weil.com>

Cc: dgrassgreen@pszjlaw.com; Irwin Schwartz <ischwartz@blaschwartz.com>; Nolan, Jack <Jack.Nolan@weil.com>; Cummings, Kyle <Kyle.Cummings@weil.com>; Michael.Reiss@lw.com; Jeffrey Ritholtz <JRitholtz@rksllp.com>; Doolittle, Jonathan <jonathan.doolittle@pillsburylaw.com>; Richard Bodnar <rbodnar@rksllp.com>; Murphy, Julie <Jmmurphy@stradley.com>; Michael Hampson <mhampson@rksllp.com>; Frank Catalina <fcatalina@rksllp.com>; metkin@lowenstein.com; abehlmann@lowenstein.com; randy.michelson@michelsonlawgroup.com; Michael Palmieri <mpalmieri@fklaw.com>

Subject: RE: PG&E -- Proposed Order with Objectors' comments

Weil team,

We did not receive a response on a time to talk today. Please advise what time works this afternoon for a meet and confer call. Thanks.

Regards,
Susan

Susan F. DiCicco

Morgan, Lewis & Bockius LLP

101 Park Avenue | New York, NY 10178-0060

Direct: +1.212.309.6640 | Main: +1.212.309.6000 | Fax: +1.212.309.6001 | Mobile: +1.914.715.3358

susan.dicicco@morganlewis.com | www.morganlewis.com

From: DiCicco, Susan F.

Sent: Friday, June 23, 2023 1:19 PM

To: 'Slack, Richard' <richard.slack@weil.com>; Gordan, Anna <Anna.Gordan@weil.com>
Cc: dgrassgreen@pszjlaw.com; Irwin Schwartz <ischwartz@blaschwartz.com>; Nolan, Jack <Jack.Nolan@weil.com>;
Cummings, Kyle <Kyle.Cummings@weil.com>; Michael.Reiss@lw.com; Jeffrey Ritholtz <JRitholtz@rksllp.com>; Doolittle,
Jonathan <jonathan.doolittle@pillsburylaw.com>; Richard Bodnar <rbodnar@rksllp.com>; Murphy, Julie
<Jmmurphy@stradley.com>; Michael Hampson <mhampson@rksllp.com>; Frank Catalina <fcatalina@rksllp.com>;
metkin@lowenstein.com; abehlmann@lowenstein.com; randy.michelson@michelsonlawgroup.com; Michael Palmieri
<mpalmieri@fklaw.com>

Subject: RE: PG&E -- Proposed Order with Objectors' comments

Our remaining comments on the proposed order Anna circulated last night are attached.

You have not proposed a time for Monday so I suggest a time between Noon and 3 p.m. ET to facilitate scheduling. Please reply all with what works or doesn't in that time window.

Regards,
Susan

Susan F. DiCicco

Morgan, Lewis & Bockius LLP

101 Park Avenue | New York, NY 10178-0060

Direct: +1.212.309.6640 | Main: +1.212.309.6000 | Fax: +1.212.309.6001 | Mobile: +1.914.715.3358

susan.dicicco@morganlewis.com | www.morganlewis.com

From: Slack, Richard <richard.slack@weil.com>

Sent: Friday, June 23, 2023 12:38 PM

To: DiCicco, Susan F. <susan.dicicco@morganlewis.com>

Cc: dgrassgreen@pszjlaw.com; Gordan, Anna <Anna.Gordan@weil.com>; Irwin Schwartz
<ischwartz@blaschwartz.com>; Nolan, Jack <Jack.Nolan@weil.com>; Cummings, Kyle <Kyle.Cummings@weil.com>;
Michael.Reiss@lw.com; Jeffrey Ritholtz <JRitholtz@rksllp.com>; Doolittle, Jonathan
<jonathan.doolittle@pillsburylaw.com>; Richard Bodnar <rbodnar@rksllp.com>; Murphy, Julie
<Jmmurphy@stradley.com>; Michael Hampson <mhampson@rksllp.com>; Frank Catalina <fcatalina@rksllp.com>;
metkin@lowenstein.com; abehlmann@lowenstein.com; randy.michelson@michelsonlawgroup.com; Michael Palmieri
<mpalmieri@fklaw.com>

Subject: Re: PG&E -- Proposed Order with Objectors' comments

[EXTERNAL EMAIL]

We are prepared to meet and confer on a procedure for amendments, including discussing the issue of the timing of amendments by all claimants. Our language allows for that discussion without pre-determining the outcome of those discussions. Our language is not intended to suggest that claimants other than the objectors cannot amend (subject to preservation of all objections to any amendment). We are not willing to add language that can be read to pre-determine an issue (i.e., whether there will be one deadline for all claimants to amend and one deadline for the Reorganized Debtors to respond to those amendments and/or object to those claims) on which we are supposed to meet and confer so we are not willing to change the language in that paragraph back to your proposed language.

The Reorganized Debtors have been prepared to meet and confer on the issues for the conference promptly upon the order being issued, and we note that it is the you and the other objectors who have delayed the process by taking a week to provide comments on the proposed order. We, in contrast, responded to your comments in less than two days.

We are prepared to meet and confer on either Sunday or Monday if necessary and will promptly issue a proposal to facilitate those discussions once the order is finalized.

On Jun 23, 2023, at 9:23 AM, DiCicco, Susan F. <susan.dicicco@morganlewis.com> wrote:

I have no objection to the inclusion of Baupost, but I don't see the value in limiting the language in para 7 to "at least the Objectors" who might amend their proofs of claim. Any securities claimant could, if it wanted to, amend their claim at any time and if Debtors are going to object to claims based on the amendment (or non-amendment) then it is more efficient for that process to apply to any securities claimant who decides to amend.

We will have some other comments on Weil's revised draft, but I'd like Debtors to offer times for when between today and Monday COB they are available to meet and confer in advance of the proposed 6/27 conference. Otherwise, I'm not sure how we can propose in the order that we'll appear at a status conference on Tuesday morning to discuss the types of procedures we are contemplating.

Regards,
Susan

Susan F. DiCicco
Morgan, Lewis & Bockius LLP
101 Park Avenue | New York, NY10178-0060
Direct: +1.212.309.6640 | Main: +1.212.309.6000 | Fax: +1.212.309.6001 | Mobile: +1.914.715.3358
susan.dicicco@morganlewis.com | www.morganlewis.com

-----Original Message-----

From: Debra Grassgreen <dgrassgreen@pszilaw.com>
Sent: Friday, June 23, 2023 12:17 AM
To: Gordan, Anna <Anna.Gordan@weil.com>; DiCicco, Susan F. <susan.dicicco@morganlewis.com>; Irwin Schwartz <jschwartz@blaschwartz.com>; Slack, Richard <richard.slack@weil.com>
Cc: Nolan, Jack <Jack.Nolan@weil.com>; Cummings, Kyle <Kyle.Cummings@weil.com>; Michael.Reiss@lw.com; Jeffrey Ritholtz <JRitholtz@rksllp.com>; Doolittle, Jonathan <jonathan.doolittle@pillsburylaw.com>; Richard Bodnar <rbodnar@rksllp.com>; Murphy, Julie <jmmurphy@stradley.com>; Michael Hampson <mhampson@rksllp.com>; Frank Catalina <fcatalina@rksllp.com>; metkin@lowenstein.com; abehlmann@lowenstein.com; randy.michelson@michelsonlawgroup.com; Michael Palmieri <mpalmieri@fklaw.com>
Subject: Re: PG&E -- Proposed Order with Objectors' comments

[EXTERNAL EMAIL]

Anna – we preferred 7(a) as initially drafted, but if you are going to use the “at least the Objectors” language, we would request that you include Baupost b/c they are not part of the defined term “Objectors”.

Please let me know if this is acceptable.

Debra

Debra Grassgreen

Pachulski Stang Ziehl & Jones
Tel: 415.217.5102
Mobile: 415.297.1994
dgrassgreen@pszilaw.com<<mailto:dgrassgreen@pszilaw.com>>

From: "Gordan, Anna" <Anna.Gordan@weil.com>
Date: Thursday, June 22, 2023 at 5:08 PM
To: "DiCicco, Susan F." <susan.dicicco@morganlewis.com>, Irwin Schwartz <ischwartz@blaschwartz.com>, "Slack, Richard" <richard.slack@weil.com>
Cc: "Nolan, Jack" <Jack.Nolan@weil.com>, "Cummings, Kyle" <Kyle.Cummings@weil.com>, "Michael.Reiss@lw.com" <Michael.Reiss@lw.com>, Jeffrey Ritholtz <JRitholtz@rksllp.com>, "Doolittle, Jonathan" <jonathan.doolittle@pillsburylaw.com>, Richard Bodnar <rbodnar@rksllp.com>, "Murphy, Julie" <Jmmurphy@stradley.com>, Michael Hampson <mhampson@rksllp.com>, Frank Catalina <fcatalina@rksllp.com>, Michael Etkin <metkin@lowenstein.com>, "abehlmann@lowenstein.com" <abehlmann@lowenstein.com>, "randy.michelson@michelsonlawgroup.com" <randy.michelson@michelsonlawgroup.com>, Debra Grassgreen <dgrassgreen@pszilaw.com>
Subject: RE: PG&E -- Proposed Order with Objectors' comments

All,

Please find attached further comments on the Proposed Order. I have also attached a redline reflecting the changes against the version circulated by Susan on Tuesday. Let us know if you have any further comments or if there are specific issues you would like to discuss.

Please note for efficiency I have also copied counsel for Baupost on this email chain.

Best,
Anna

[Description: Description: Description: Description: 100902WeilWebSmall]

Anna Gordan

Weil, Gotshal & Manges LLP
767 Fifth Avenue
New York, NY 10153
anna.gordan@weil.com<<mailto:anna.gordan@weil.com>>
+1 212 310 8742 Direct

From: DiCicco, Susan F. <susan.dicicco@morganlewis.com>
Sent: Thursday, June 22, 2023 4:57 PM
To: Irwin Schwartz <ischwartz@blaschwartz.com>; Slack, Richard <richard.slack@weil.com>
Cc: Gordan, Anna <Anna.Gordan@weil.com>; Nolan, Jack <Jack.Nolan@weil.com>; Cummings, Kyle <Kyle.Cummings@weil.com>; Michael.Reiss@lw.com <Michael.Reiss@lw.com>; Jeffrey Ritholtz <JRitholtz@rksllp.com>; Doolittle, Jonathan <jonathan.doolittle@pillsburylaw.com>; Richard Bodnar <rbodnar@rksllp.com>; Murphy, Julie <Jmmurphy@stradley.com>; Michael Hampson <mhampson@rksllp.com>; Frank Catalina <fcatalina@rksllp.com>; metkin@lowenstein.com <metkin@lowenstein.com>; abehlmann@lowenstein.com <abehlmann@lowenstein.com>; randy.michelson@michelsonlawgroup.com <randy.michelson@michelsonlawgroup.com>
Subject: RE: PG&E -- Proposed Order with Objectors' comments

Yes, I agree.

Susan F. DiCicco
Morgan, Lewis & Bockius LLP
101 Park Avenue | New York, NY 10178-0060
Direct: +1.212.309.6640 | Main: +1.212.309.6000 | Fax: +1.212.309.6001 | Mobile: +1.914.715.3358
www.morganlewis.com<<http://www.morganlewis.com>>
[cid:image002.gif@01D9A54E.D83C1A70]<<https://anniversary.morganlewis.com>>

From: Irwin Schwartz <ischwartz@blaschwartz.com<<mailto:ischwartz@blaschwartz.com>>>
Sent: Thursday, June 22, 2023 3:00 PM
To: Slack, Richard <richard.slack@weil.com<<mailto:richard.slack@weil.com>>>; DiCicco, Susan F. <susan.dicicco@morganlewis.com<<mailto:susan.dicicco@morganlewis.com>>>
Cc: Gordan, Anna <Anna.Gordan@weil.com<<mailto:Anna.Gordan@weil.com>>>; Nolan, Jack <Jack.Nolan@weil.com<<mailto:Jack.Nolan@weil.com>>>; Cummings, Kyle <Kyle.Cummings@weil.com<<mailto:Kyle.Cummings@weil.com>>>; Michael.Reiss@lw.com<<mailto:Michael.Reiss@lw.com>>; Jeffrey Ritholtz <JRitholtz@rksllp.com<<mailto:JRitholtz@rksllp.com>>>; Doolittle, Jonathan <jonathan.doolittle@pillsburylaw.com<<mailto:jonathan.doolittle@pillsburylaw.com>>>; Richard Bodnar <rbodnar@rksllp.com<<mailto:rbodnar@rksllp.com>>>; Murphy, Julie <Jmmurphy@stradley.com<<mailto:Jmmurphy@stradley.com>>>; Michael Hampson <mhampson@rksllp.com<<mailto:mhampson@rksllp.com>>>; Frank Catalina <fcatalina@rksllp.com<<mailto:fcatalina@rksllp.com>>>; metkin@lowenstein.com<<mailto:metkin@lowenstein.com>>; abehlmann@lowenstein.com<<mailto:abehlmann@lowenstein.com>>; randy.michelson@michelsonlawgroup.com<<mailto:randy.michelson@michelsonlawgroup.com>>>
Subject: RE: PG&E -- Proposed Order with Objectors' comments

[EXTERNAL EMAIL]
Greetings all,

Does it make sense for us to inform the Court that the parties are still negotiating the language for the proposed order?

Thanks

Irwin

From: Slack, Richard <richard.slack@weil.com<<mailto:richard.slack@weil.com>>>
Sent: Thursday, June 22, 2023 12:22 PM
To: DiCicco, Susan F. <susan.dicicco@morganlewis.com<<mailto:susan.dicicco@morganlewis.com>>>
Cc: Gordan, Anna <Anna.Gordan@weil.com<<mailto:Anna.Gordan@weil.com>>>; Nolan, Jack <Jack.Nolan@weil.com<<mailto:Jack.Nolan@weil.com>>>; Cummings, Kyle <Kyle.Cummings@weil.com<<mailto:Kyle.Cummings@weil.com>>>; Michael.Reiss@lw.com<<mailto:Michael.Reiss@lw.com>>; Jeffrey Ritholtz <JRitholtz@rksllp.com<<mailto:JRitholtz@rksllp.com>>>; Doolittle, Jonathan <jonathan.doolittle@pillsburylaw.com<<mailto:jonathan.doolittle@pillsburylaw.com>>>; Irwin Schwartz <ischwartz@blaschwartz.com<<mailto:ischwartz@blaschwartz.com>>>; Richard Bodnar <rbodnar@rksllp.com<<mailto:rbodnar@rksllp.com>>>; Murphy, Julie <Jmmurphy@stradley.com<<mailto:Jmmurphy@stradley.com>>>; Michael Hampson <mhampson@rksllp.com<<mailto:mhampson@rksllp.com>>>; Frank Catalina <fcatalina@rksllp.com<<mailto:fcatalina@rksllp.com>>>;

metkin@lowenstein.com<<mailto:metkin@lowenstein.com>>;
abehlmann@lowenstein.com<<mailto:abehlmann@lowenstein.com>>;
randy.michelson@michelsonlawgroup.com<<mailto:randy.michelson@michelsonlawgroup.com>>
Subject: Re: PG&E -- Proposed Order with Objectors' comments

We will have comments.
Sent from my iPad

On Jun 22, 2023, at 12:11 PM, DiCicco, Susan F.
<susan.dicicco@morganlewis.com<<mailto:susan.dicicco@morganlewis.com>>> wrote:

Weil team,
We have received no response to the comments we sent on Tuesday (attached again). If we do not hear back by 3 p.m. ET today we will file our marked copy as a competing proposed order to the one you filed on Tuesday.
Susan

Susan F. DiCicco
Morgan, Lewis & Bockius LLP
101 Park Avenue | New York, NY 10178-0060
Direct: +1.212.309.6640 | Main: +1.212.309.6000 | Fax: +1.212.309.6001 | Mobile: +1.914.715.3358
www.morganlewis.com<<http://www.morganlewis.com>>
<image001.gif><<https://anniversary.morganlewis.com/>>

From: DiCicco, Susan F. <susan.dicicco@morganlewis.com<<mailto:susan.dicicco@morganlewis.com>>>

Sent: Tuesday, June 20, 2023 1:57 PM

To: Gordan, Anna <Anna.Gordan@weil.com<<mailto:Anna.Gordan@weil.com>>>; Slack, Richard
<richard.slack@weil.com<<mailto:richard.slack@weil.com>>>; Nolan, Jack
<Jack.Nolan@weil.com<<mailto:Jack.Nolan@weil.com>>>; Cummings, Kyle
<Kyle.Cummings@weil.com<<mailto:Kyle.Cummings@weil.com>>>;
Michael.Reiss@lw.com<<mailto:Michael.Reiss@lw.com>>>

Cc: DiCicco, Susan F. <susan.dicicco@morganlewis.com<<mailto:susan.dicicco@morganlewis.com>>>;
Jeffrey Ritholtz <JRitholtz@rksllp.com<<mailto:JRitholtz@rksllp.com>>>; Doolittle, Jonathan
<jonathan.doolittle@pillsburylaw.com<<mailto:jonathan.doolittle@pillsburylaw.com>>>; Irwin Schwartz
<ischwartz@blaschwartz.com<<mailto:ischwartz@blaschwartz.com>>>; Richard Bodnar
<rbodnar@rksllp.com<<mailto:rbodnar@rksllp.com>>>; Murphy, Julie
<Jmmurphy@stradley.com<<mailto:Jmmurphy@stradley.com>>>; Michael Hampson
<mhampson@rksllp.com<<mailto:mhampson@rksllp.com>>>; Frank Catalina
<fcatalina@rksllp.com<<mailto:fcatalina@rksllp.com>>>;
metkin@lowenstein.com<<mailto:metkin@lowenstein.com>>;
abehlmann@lowenstein.com<<mailto:abehlmann@lowenstein.com>>;
randy.michelson@michelsonlawgroup.com<<mailto:randy.michelson@michelsonlawgroup.com>>

Subject: PG&E -- Proposed Order with Objectors' comments

Weil,
Attached are collective comments on the proposed Order from the objecting securities claimants (not PERA counsel). Please let us know if you would like to discuss.

Regards,
Susan

Susan F. DiCicco

Morgan, Lewis & Bockius LLP
101 Park Avenue | New York, NY 10178-0060
Direct: +1.212.309.6640 | Main: +1.212.309.6000 | Fax: +1.212.309.6001 | Mobile: +1.914.715.3358
www.morganlewis.com<<http://www.morganlewis.com>>
<065718__139116780v1_Proposed Order with Objectors' comments 6_20.DOCX>

The information contained in this email message is intended only for use of the individual or entity named above. If the reader of this message is not the intended recipient, or the employee or agent responsible to deliver it to the intended recipient, you are hereby notified that any dissemination, distribution or copying of this communication is strictly prohibited. If you have received this communication in error, please immediately notify us by email, postmaster@weil.com<<mailto:postmaster@weil.com>>, and destroy the original message. Thank you.

The information contained in this email message is intended only for use of the individual or entity named above. If the reader of this message is not the intended recipient, or the employee or agent responsible to deliver it to the intended recipient, you are hereby notified that any dissemination, distribution or copying of this communication is strictly prohibited. If you have received this communication in error, please immediately notify us by email, postmaster@weil.com, and destroy the original message. Thank you.